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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 Sherri Lynne Love,

14 Petitioner,

15 v.

16 State of Nevada, et al.,

17 Respondents.

Case No. 2:17-cv-02419-JAD-PAL

**Stipulation and Order Extending Time to
File First Amended Petition**

**(Second stipulation)
(Seventh request for extension)**

ECF No. 19

19 The parties hereby provide this Court with a joint status report, per ECF No.
20 18 at 2, regarding the status of ongoing negotiations between Ms. Love and the
21 Clark County District Attorney's Office, on behalf of the State of Nevada, which
22 may result in an alternative global resolution of this case. Further, the parties
23 hereby stipulate to another 45-day extension of time for Ms. Love to file her first
24 amended petition or other related pleading, up to and including January 10, 2019.
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26
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1 The parties' first stipulation indicated, according to Ms. Love's counsel, that
2 there are ongoing negotiations between Ms. Love and the Clark County District
3 Attorney's office, on behalf of the State of Nevada, to globally resolve this case. Ms.
4 Love's counsel represented that her first amended petition is complete, however, she
5 agreed to withhold filing the petition—with this Court's permission—unless and
6 until negotiations fail to resolve the case.

7 The court approved the parties' stipulation, which provided for a 45-day
8 extension of the deadline for Ms. Love to file her first amended petition or to file a
9 status update to the court in the event that 45 days proves insufficient to complete
10 the alternative-resolution process.¹ This rendered a deadline of November 26, 2018.
11 Alternatively, the parties stipulated, if negotiations do not result in a resolution of
12 this case, Ms. Love will promptly file her amended petition upon termination of
13 negotiations.²

14 Since this court's last order approving the stipulation, upon Ms. Love's
15 counsel's information and belief, the parties have continued to negotiate and a
16 global resolution of this matter remains reasonably possible. First Assistant Federal
17 Public Defender, Lori Teicher, has been the Federal Public Defender's point of
18 contact for negotiations, and Assistant District Attorney Robert Daskas has been
19 the point of contact for negotiations for the State.

20 Ms. Love's counsel represents that another extension is needed to allow the
21 State to complete review Ms. Love's casefile and complete negotiations. There have
22 been repeated contacts between Ms. Teicher and Mr. Daskas, on behalf of Ms. Love
23 and the State, respectively, to this effect, and Ms. Love's counsel is informed and
24 believes that due to schedule demands, negotiations would be able to be finalized
25

26 ¹ ECF No. 18.

27 ² *Id.* at 2.

1 shortly after the Thanksgiving weekend. After, however, time will still be needed to
2 calendar the matter in the state court and make any resolution final and legally
3 binding. Ms. Love's counsel represents that another 45-day extension is needed to
4 allow this whole process to complete. As before, if 45 days proves insufficient time,
5 the parties will provide this court with a joint status report on the progress of
6 negotiations. Alternatively, if negotiations cease without a resolution of this matter,
7 Ms. Love's counsel will promptly file the amended petition.

8 Respondents stipulate to this extension based on the representations of Ms.
9 Love's counsel, though the parties agree that this stipulation does not waive any
10 procedural defenses or statute-of-limitations challenges that respondents may raise
11 in this case. The parties also agree that this stipulation does not constitute
12 respondents' agreement with any of Ms. Love's representations in this or any other
13 court filing.

14 Therefore, if this court approves this stipulation, the deadline for Ms. Love to
15 file her first amended petition, or for the parties to provide this Court with a status
16 report, is extended up to and including Thursday, January 10, 2019. If negotiations
17 terminate without agreement, Ms. Love will promptly file her amended petition,
18 without delay.

19
20 Dated November 26, 2018.

21 Respectfully submitted,

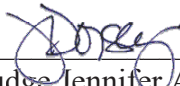
22 RENE L. VALLADARES
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ADAM PAUL LAXALT
Attorney General

24 /s/ S. Alex Spelman
25 S. Alex Spelman (Bar No. 14278)
26 Assistant Federal Public Defender
For Petitioner

/s/ Amanda C. Sage
AMANDA C. SAGE (Bar No. 13429)
Deputy Attorney General
For Respondents

27 **IT IS SO ORDERED.**



U.S. District Judge Jennifer A. Dorsey
Dated: November 27, 2018